

2. All facts set forth in this Declaration are based upon my personal knowledge of Arena's employees, operations and finances, information learned from my review of relevant documents, information supplied to me by other members of Arena's management team and their advisors, or my opinion based on my experience, knowledge, and information concerning the Debtors' operations, financial affairs, and restructuring initiatives. If called upon to testify, I could and would testify to the facts and opinions set forth in this Declaration.

3. I have reviewed and am familiar with the documents and data that Arena placed in the virtual data room to facilitate the Evercore sales process. The substantial and comprehensive data contained in the virtual data room reflects Arena's desire to provide potential bidders who sign a confidentiality agreement with a fulsome and comprehensive body of information about Arena's assets.

4. Exhibit 8 to the Complaint is a true and correct copy of a document listing the documents and data Arena placed in the virtual data room. I am familiar with this document and can confirm that it accurately represents what is in the data room.

5. I am familiar with and work with the seismic data that is reflected in materials in the data room, including maps and seismic lines. The reprocessed seismic data reflected in materials in the data room is highly confidential and provides Arena with a significant competitive advantage. Arena has spent years and significant resources working to refine its seismic data to better identify potential plays. Only a handful of companies have access to the underlying seismic data, and Arena is the only company that has access to the reprocessed seismic data. Arena has used the seismic data to identify a number of our prospects, and Arena would not have been able to find many of its prospects without this data. This data allows Arena to discover prospects where its competitors cannot. If Arena's competitors gain access to the

materials reflecting Arena's seismic data, Arena will need to bid more to acquire prospects, and I expect that certain prospects will not become available that otherwise would have. There is no way to know the full harms to Arena if the materials containing Arena's confidential and proprietary reprocessed seismic data become available to its competitors without the protections of a confidentiality agreement that prohibit the use of this information for competitive purposes.

6. The data room also contains confidential information about our discovery and drilling methodology as well as information about where our methodology has been successful. If this information were in the hands of Arena's competitors, it would be highly damaging to Arena. Arena has developed its methodology over the past two decades at substantial cost to Arena.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: August 28, 2020
Houston, Texas

/s/ Don Metz
Name: Don Metz
Arena Energy, LP
Chief Geologist